

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

AAL USA, INC.,)	
)	
Plaintiff,)	
)	
v.)	CASE NO. 2:16-cv-02090-KOB
)	
BLACK HALL AEROSPACE, INC.,)	
<i>et al.</i> ,)	
)	
Defendants.)	

**MOTION FOR LEAVE TO FILE RENEWED
MOTION TO STAY AND SUPPORTING EXHIBITS UNDER SEAL**

Defendants Paul Daigle and Keith Woolford (collectively the "Defendants") respectfully request this Court enter an Order granting Defendants leave to file their Renewed Motion to Stay and its supporting exhibits under seal. As grounds for, and in support of, this motion, Defendants state as follows:

1. Based on developments and additional information now available, Defendants intended to renew their motion to stay which, after motion for leave to file under seal and a telephone hearing, the Court permitted to be filed under seal. (*See* ECF 71 (motion for leave) and 76 (Order granting leave)).

2. Rule 5.2 of the *Federal Rules of Civil Procedure* states, in pertinent part: "The court may order that a filing be made under seal without redaction. The court may later unseal the filing or order the person who made the filing to file a

redacted version for the public record.” FED. R. CIV. P. 5.2(d). The Renewed Motion to Stay incorporates the materials already under seal and contains additional sensitive, personal information of the same nature contained with the initial motion to stay, which the Court has already determined to be appropriate for sealing, and requests certain relief as a result thereof. For this reason, it is not possible to file a redacted version of this Motion or to fully explain the contents of that Motion herein.

3. Defendants further request that any responsive filings, or Orders the Court may issue on the Renewed Motion to Stay, which reference, reveal, or describe the sensitive information contained therein, likewise be entered under seal.

4. Defendants emphasize that the same types of information and supporting documentation and testimony which the Court has previously sealed are contained in or filed in support of the Renewed Motion to Stay. Should the Court later reconsider sealing these pleadings, that can be the subject of a later hearing or further consideration. As with Defendants' initial motion for leave to file under seal, should the Court require additional information about the contents of the Renewed Motion for Stay, Defendants respectfully request that the Court set this matter for telephone conference, under seal, so that counsel for the Defendants can more fully explain the circumstances that form the basis of the Renewed Motion to Stay.

WHEREFORE, premises considered, Defendants respectfully request that they be granted leave to file their Renewed Motion to Stay and supporting exhibits

under seal and that the Court require that any responsive filings, or Orders of the Court, which reference, reveal, or describe the sensitive information contained therein likewise be entered under seal.

Dated: August 2, 2017

Respectfully submitted,

/s/ Roderic G. Steakley

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CERTIFICATE OF SERVICE

I hereby certify that on August 2, 2017, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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